

BOARD:  
Elizabeth M. Hagood  
Chairman  
Edwin H. Cooper, III  
Vice Chairman  
Steven G. Kisner  
Secretary



C. Earl Hunter, Commissioner

*Promoting and protecting the health of the public and the environment*

BOARD:  
Henry C. Scott  
Paul C. Aughtry, III  
Glenn A. McCall  
Coleman F. Buckhouse, MD

December 18, 2006

Mr. J. I. Palmer, Jr., Regional Administrator  
U.S. EPA, Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

RE: December 2006 Early Action Progress Report

Dear Mr. Palmer:

South Carolina continues to be committed to the 8-hour Ozone Early Action Process. Partnership opportunities have been developed and the awareness of local officials about air quality issues has resulted in proactive, voluntary and regulatory actions that would not have occurred without the Early Action Compact (EAC) process. In South Carolina we continue to see activities that remain a part of the EAC process, above and beyond that required of an area with a "traditional" nonattainment designation.

Data from the EPA's Air Quality System (AQS) reveals South Carolina's were in attainment of the 8-hour ozone standard over the 2004-2006 ozone seasons. The table in Enclosure 2 gives the 4<sup>th</sup> highest 8-hour averages for each of the 21 monitors for the years 2002, 2003, 2004, 2005 and 2006 as well as the three year average for 2003-2005 and 2004-2006. These numbers are based on data validated through October 2006. Once all of the 2006 data has been verified any necessary updates will be provided. No violations of the 8-hour ozone standard for 2004 – 2006 are expected.

South Carolina EAC's identify "key" milestones that are required for the continued deferral of the effective date of nonattainment designations and also milestones that track the progress being made by the state and local areas toward adoption and implementation of emission reduction measures. The attached document includes the table provided by EPA's guidance document of October 17, 2005, for each participating county identifying each of the local measures included in their respective local early action plan. Additionally, a narrative description of activity from the five deferred nonattainment areas is included in Enclosure 3. Information regarding stakeholder meetings and other activities that have occurred since June 2006, as well as specific details documenting the progress toward measures included in the local early action plans is included for each county and is grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg  
Catawba: Chester, Lancaster, Union, York  
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro  
Waccamaw: Georgetown, Horry, Williamsburg  
Santee Lynches: Clarendon, Kershaw, Lee, Sumter  
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester  
Low Country: Beaufort, Colleton, Hampton, Jasper  
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg  
Central Midlands: Fairfield, Lexington, Newberry, Richland  
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

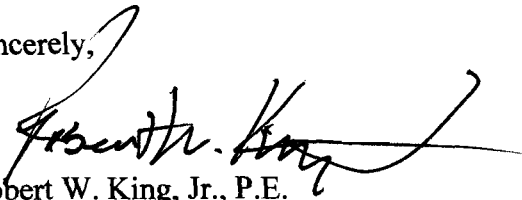
While the emission reduction strategies submitted by the local areas contain both quantifiable and directionally sound measures, it should be noted that none of them were used to demonstrate attainment in 2007. Nonetheless, it is expected that these measures will assist the counties in achieving and or maintaining compliance with the 8-hour ozone standard. A table and narrative description identifying statewide activities and progress made toward each is included. South Carolina looks forward to continuing to work with EPA and other stakeholders in additional future activities.

South Carolina also committed to an annual review of growth (highway mobile and stationary NO<sub>x</sub> sources) to ensure emission reduction strategies and growth are adequate as well as identification and quantification of federal, state, and/or local measures indicating sufficient reductions to offset growth estimates. The Departments' review found that for both areas designated nonattainment with the effective date deferred, the actual emissions were lower than the forecasted modeled data and the 2005 VMT was well below the action trigger. Additionally, the local and state transportation plans for the deferred nonattainment areas shows a tremendous decrease in emissions over the next 25 years. Detailed information with supporting graphs is included in Enclosure 2.

The Department continues to be pleased with the energy of the participants in the EAC process including counties, agencies, universities, organizations, businesses, industries and environmental groups. The continuing effort of these groups is a marvelous example of partnerships in many directions. Each of these diverse parties has come together for a worthy common goal of providing cleaner air sooner to the citizens of South Carolina. The Early Action Compact Summit, held August 16 and 17, 2006 was a great success. As the first of its kind, it attracted nearly 300 stakeholders from 5 different states including representatives from 24 counties and 7 Councils of Government. Topics covered included energy conservation, diesel retrofits, land use planning, alternative fuels, commuting options and multi-modal transportation, innovative education and outreach, health impacts/lifestyle and finding the funding. Key speakers included Bill Wehrum, Acting Assistant Administrator for Air & Radiation, U.S. Environmental Protection Agency, and Mark MacLeod, the Director for Special Projects in Environmental Defense's Climate and Air program working out of the Washington DC office. For additional information see Enclosure 4 Statewide EAC Activities.

Thank you for the continued assistance and support EPA has provided in this process. We look forward to continuing to work with EPA and other stakeholders as we implement measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Myra Reece, Chief of the Bureau of Air Quality at (803) 898-4123.

Sincerely,



Robert W. King, Jr., P.E.  
Deputy Commissioner  
Environmental Quality Control

Enclosures

cc: Kay Prince, EPA Region 4  
County Officials (no attachments\*)  
Ron Methier, GA Dept. of Natural Resources (no attachments\*)  
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments\*)  
Myra Reece (no attachments\*)  
EQC Regional Directors (no attachments\*)

\*All those not receiving attachments will be notified when materials are placed on our website.

**South Carolina's Ozone Early Action Compact  
December 2006 Progress Report  
Enclosures  
December 18, 2006**

1. 3-Year Ozone Average Summary to Date, AQS Data
2. South Carolina's Comprehensive Maintenance Plan
3. Local EAC Activities for Participating Areas
4. Statewide EAC Activities
5. Federal Facilities Survey Results